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July 25, 2025

**VIA ECF**

Hon. Alvin K. Hellerstein  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: United States v. Charlie Javice and Olivier Amar, 23 Cr. 251 (AKH)

Dear Judge Hellerstein:

Defendant Charlie Javice respectfully requests an extension of time until September 8, 2025, to provide her sentencing submission to the Court, and a resulting adjournment of her sentencing until September 29, 2025. The government's submission would accordingly be due September 15, 2025.

Pursuant to the Court's Order Regulating Proceedings, *see* ECF 407, Ms. Javice's sentencing is scheduled for August 28, 2025, and her sentencing submission is due on August 7, 2025. The government's sentencing submission is currently due August 14, 2025. Ms. Javice understands that the final Presentence Report will not be disclosed by United States Probation until August 4, 2025, three days before her sentencing submission is currently due. Pursuant to Federal Rule of Criminal Procedure 32(e)(2), Ms. Javice requests that the Court extend the deadline for her sentencing submission approximately four weeks, to September 8, 2025. Extending the sentencing submission deadline to September 8 will afford Ms. Javice and her counsel the full 35-day review period permitted under the Rule. The extension will also allow Ms. Javice to continue to review and evaluate the government's responses to her initial objections, which she received two days ago, on July 23, 2025. In light of this requested extension, Ms. Javice requests that her sentencing be adjourned accordingly, to September 29, 2025.

Ms. Javice requests this four-week extension for two additional reasons personal to Ms. Javice and her counsel.<sup>1</sup> First, [REDACTED]

<sup>1</sup> A portion of this paragraph has been redacted on the public docket to protect sensitive personal information. An unredacted motion will be submitted to the Court under seal.

So ordered  
Sentencing will occur  
Sep 29 2025, 10:30 am  
in Courtroom 14D.  
7:30-25  
Alvin K. Hellerstein

. Second,

United States Probation Officer Ashley Geiser does not oppose Ms. Javice's request. The government takes no position, but notes that it expects to oppose any further adjournment requests.

Respectfully submitted,

/s/ Erica L. Perdomo

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cc: All Counsel of Record (via ECF)